

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1

LOWENSTEIN SANDLER LLP

Kenneth A. Rosen, Esq.
Joseph J. DiPasquale, Esq.
Eric S. Chafetz, Esq.
Michael Papandrea, Esq.
One Lowenstein Drive
Roseland, New Jersey 07068
(973) 597-2500 (Telephone)
(973) 597-2400 (Facsimile)

*Proposed Counsel to the Debtors and
Debtors-in-Possession*

In re:

FRANK THEATRES BAYONNE/SOUTH COVE,
LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 18-34808 (SLM)

(Jointly Administered)

ADJOURNMENT REQUEST

1. I, Michael Papandrea, an attorney with Lowenstein Sandler LLP, counsel for Frank Theatres Bayonne/South Cove, LLC, *et al.* (the “Debtors”), hereby request an adjournment of the following hearing for the reason set forth below.

Matter: Debtors’ Motion For Entry Of An Order (A) Establishing Deadlines to File Proofs of Claim Against the Debtors Including but not Limited to Claims Arising Under Section 503(b)(9) of the Bankruptcy Code, (B) Approving the Form and Manner of Notice of the Bar Dates, (C) Authorizing Publication of the Bar Dates, and (D) Granting Related Relief (the “Motion”) [Docket No. 87]

¹ The Debtors in these chapter 11 cases and the last four digits of each Debtor’s taxpayer identification number are as follows: Frank Theatres Bayonne/South Cove, LLC (3162); Frank Entertainment Group, LLC (3966); Frank Management LLC (0186); Frank Theatres, LLC (5542); Frank All Star Theatres, LLC (0420); Frank Theatres Blacksburg LLC (2964); Frank Theatres Delray, LLC (7655); Frank Theatres Kingsport LLC (5083); Frank Theatres Montgomeryville, LLC (0692); Frank Theatres Parkside Town Commons LLC (9724); Frank Theatres Rio, LLC (1591); Frank Theatres Towne, LLC (1528); Frank Theatres York, LLC (7779); Frank Theatres Mt. Airy, LLC (7429); Frank Theatres Southern Pines, LLC (2508); Frank Theatres Sanford, LLC (7475); Frank Theatres Shallotte, LLC (7548); Revolutions at City Place LLC (6048); Revolutions of Saucon Valley LLC (1135); Frank Entertainment Rock Hill LLC (0753); Frank Entertainment PSL, LLC (7033); Frank Hospitality Saucon Valley LLC (8570); Frank Hospitality York LLC (6617); and Galleria Cinema, LLC (2529).

Current Hearing Date: January 28, 2019 at 10:00 a.m.. (ET)

Objection deadline: January 15, 2019 at 4:00 p.m. (ET) for all parties except the Official Committee of Unsecured Creditors (the "Committee") and the Office of the United States Trustee ("US Trustee");

The Committee's objection deadline was extended to January 17, 2019 at 12:00 p.m. (ET);

The Debtors have agreed to extend the US Trustee's objection deadline to five (5) days before the hearing date.

New Hearing Date Requested: February 4, 2019 at 10:00 a.m. (ET) or as soon as possible thereafter depending on the Court's availability.

Reason for adjournment request: The parties are working to reach a resolution of the Motion.

2. Consent to adjournment:

☒ I have the consent of all parties. ☐ I do not have the consent of all parties (explain below).

The only parties that have been in contact with the Debtors or raised any comments regarding the Motion are the Committee and the US Trustee. The Debtors consulted the Committee and the US Trustee and neither the Committee nor the US Trustee raised any issues with the adjournment requested herein.

I certify under penalty of perjury that the foregoing is true.

Date: 1/24/2019

/s/ Michael Papandrea
Signature

COURT USE ONLY:

The request for adjournment is:

☒ Granted New hearing date: 02/11/19 10:00 a.m. ☐ Peremptory
☐ Granted over objection(s) New hearing date: _____ ☐ Peremptory
☐ Denied

IMPORTANT: If your request is granted, you must notify interested parties who are not electronic filers of the new hearing date.